

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHASE LOTFI,  
Plaintiff,  
v.  
MCLAREN AUTOMOTIVE, INC.,  
Defendant.

Case No. 1:22-cv-01658  
Honorable Judge Martha M. Pacold  
Honorable Magistrate Judge Jeffrey T. Gilbert

**JOINT STATUS REPORT**

Now come the Plaintiff, CHASE LOTFI, and the Defendant, MCLAREN AUTOMOTIVE, INC. (collectively, the “Parties”), by and through their attorneys, and pursuant to the Court’s Order of September 8, 2022 (Doc. #32), the Parties hereby submit the following Joint Status Report:

(1) The Parties propose the following modifications to the case management schedule set on May 24, 2022 (Doc. #22), with respect to fact and expert discovery, to accommodate the delay caused by the parties’ extended settlement discussions in which the Court assisted.

- Fact Discovery Completion Deadline – January 20, 2023
- Initial Expert Witness Disclosures – February 20, 2023
- Rebuttal Expert Witness Disclosures – March 30, 2023
- Expert Discovery Completion Deadline – May 5, 2023

(2) At this time, the Parties intend to depose the following fact witnesses before the close of fact discovery.

(a) Witnesses Plaintiff Intends to Depose:

- i. Pat Dahlberg, McLaren Automotive, Inc.

- ii. Mike Carter, McLaren Automotive, Inc.
- iii. Andrew Bellenie, McLaren Automotive, Inc.
- iv. Gretchen Barbaro, McLaren of Chicago
- v. David Sarna, McLaren of Chicago
- vi. Chris Marshall, McLaren of Chicago
- vii. Tech 19, McLaren of Chicago (name unknown at this time)
- viii. James LaPorte, Apex Motorsports, LLC
- ix. Rule 30(b)(6) witness(es) produced by Defendant, if different than the individuals specifically named above.
- x. Any other witnesses identified by Defendant or during the course of discovery.

(b) Witnesses Defendant Intends to Depose:

- i. Chase Lotfi, Plaintiff
- ii. Nathaniel Herz, BBB Auto Line Arbitrator
- iii. Any other witnesses identified by Plaintiff or during the course of discovery with knowledge of the use, payments, service, condition, modifications and value of, and damage to, the subject vehicle.

(3) Counsel for the Parties have compared their calendars and at this time they are available to conduct depositions on the following dates. Defendant's counsel will provide available dates for an inspection of the subject vehicle. Depositions of party witnesses will be scheduled by agreement from this list of available dates, and subpoenas will be served for the depositions of non-party witnesses from this list of available dates.

- October 24, 25, 31
- November 1, 2, 4, 9, 10, 21, 22, 29
- December 2, 5, 7, 8, 9, 12, 14, 15, 19, 20
- January 3, 4, 5, 6, 9, 10, 11, 12, 13, 18

RESPECTFULLY SUBMITTED,

/s/ David B. Levin  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 22, 2022, a copy of the foregoing Joint Status Report was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ David B. Levin  
Attorney for Plaintiff